

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

Art Van Furniture, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 7

Case No. 20-10553 (CTG)

Jointly Administered

Alfred T. Giuliano, solely in his capacity as the  
Chapter 7 Trustee of Art Van Furniture, LLC, *et al.*,

Plaintiff,

-against-

Archie A. Van Elslander Trust dated November  
26, 1982, as Amended, the Estate of Archie A.  
Van Elslander, Gary A. Van Elslander, Gary A.  
Van Elslander Revocable Trust, David P. Van  
Elslander, Debra A. Van Elslander, Debra A. Van  
Elslander Revocable Trust, Kenneth A. Van  
Elslander, Kenneth A. Van Elslander Revocable  
Trust, Sandra L. Seroka, Karen B. Paglino, Karen  
B. Paglino Revocable Trust, Lori J. Webb, Kim  
M. Van Elslander a/k/a Kim M. Campau, Kris A.  
Scarfone, Beth M. Wood, AV Conner Holdings,  
Inc., VEV Real Estate LLC, and Richard Kim  
Yost, and John Does 1-100,

Defendants.

Adv. Proc. No. 22-50229 (CTG)

**CERTIFICATION OF COUNSEL SUBMITTING PROPOSED ORDER AND  
STIPULATION EXTENDING THE TIME FOR THE VAN ELSLANDER DEFENDANTS  
TO RESPOND TO THE COMPLAINT**

<sup>1</sup> The Debtors in these chapter 7 cases, along with the last four digits of each Debtor's federal tax identification number, are: Art Van Furniture, LLC (9205); AVF Holding Company, Inc. (0291); AVCE, LLC (2509); AVF Holdings I, LLC (2537); AVF Holdings II, LLC (7472); AVF Parent, LLC (3451); Levin Parent, LLC (8052); Art Van Furniture of Canada, LLC (9491); AV Pure Sleep Franchising, LLC (8968); AVF Franchising, LLC (6325); LF Trucking, Inc. (1484); Sam Levin, Inc. (5198); and Comfort Mattress LLC (4463).

I, Bryan J. Hall, hereby certify as follows:

1. On March 7, 2022, Alfred T. Giuliano, solely in his capacity as the chapter 7 trustee (the “Trustee”) for the bankruptcy estates of the above-captioned Debtors, commenced this adversary proceeding by filing the *Complaint* [Adv. D.I. 1] (the “Complaint”).

2. Defendants Archie A. Van Elslander Trust dated November 26, 1982, the Estate of Archie A. Van Elslander, Gary A. Van Elslander, Gary A. Van Elslander Revocable Trust, David P. Van Elslander, Debra A. Van Elslander, Debra A. Van Elslander Revocable Trust, Kenneth A. Van Elslander, Kenneth A. Van Elslander Revocable Trust, Sandra L. Seroka, Karen B. Paglino, Karen B. Paglino Revocable Trust, Lori J. Webb, Kim M. Van Elslander a/k/a Kim M. Campau, Kris A. Scarfone, Beth M. Wood, AV Conner Holdings, Inc., and VEV Real Estate LLC (collectively, the “Van Elslander Defendants”) have requested an extension of time to respond to the Complaint.

3. The parties have stipulated to extend the Van Elslander Defendants’ time to respond to the Complaint until June 10, 2022, as reflected in the Stipulation attached as Exhibit 1 (the “Stipulation”) to the proposed order attached hereto as Exhibit A (the “Proposed Order”). The Stipulation is being submitted on consent.

4. Based on the foregoing, the undersigned respectfully requests that the Court enter the Proposed Order approving the Stipulation without further notice or hearing.

Dated: April 21, 2022

ARCHER & GREINER, P.C.

/s/ Bryan J. Hall

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capacity as the Chapter 7 Trustee of Art Van  
Furniture, LLC, et al.*